

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Sage Elolba Hall Winston

Write the full name of each
plaintiff.

No. _____
(To be filled out by Clerk's
Office)

-against-

COMPLAINT
(Prisoner)

CALVIN S. BLACK D/B/A NYPD SGT, Tax ID #

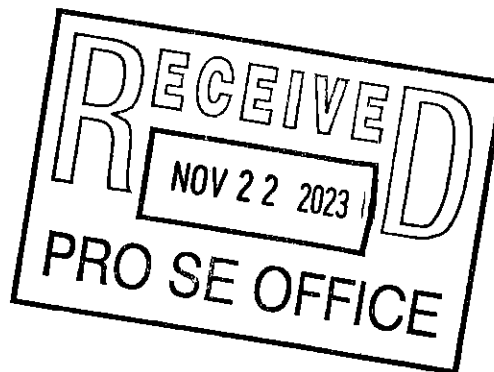
Do you want a jury trial?
☒ Yes No

948676, et al.

ALL IN THEIR PERSONAL AND OFFICIAL

CAPACITY

Write the full name of each defendant. If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section IV.



NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

Rev. 5/6/16

1. LEGAL BASIS FOR CLAIM

State below the federal legal basis for your claim, if known. This form is designed primarily for prisoners challenging the constitutionality of their conditions of confinement; those claims are often brought under 42 U.S.C. 5 1983, 18 USC § 241 & 242 against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

- ☒ Violation of my federal constitutional rights 4 Amendmet, 5th, 6; 18 USC § 3006A, (59 Stat. 1031), USC UN Charter, Declaration on Human Right, Rights of ~~Other~~ Indigenous People, Article 4, section 1. Article III. section 2 & 2.
- Amendmen 9, 10

II. PLAINTIFF INFORMATION

Each plaintiff must provide the following information. Attach additional pages if necessary.

SageEI

First Name

Middle Initial

Last Name

d/b/a Hall, Winston

State any other names (or different forms of your name) you have ever used, including any name you have used in previously filing a lawsuit.

B# 2412302079, NYSID#: 08541004H

Prisoner ID # (if you have previously been in another agency's custody, please specify each agency and the ID number (such as your DIN or NYSID) under which you were held)

OBCC, 1600 Hazen Street,

Current Place of Detention

1600 Hazen Street

Institutional Address

East Elmhurst

County, City

New York

State

[11370]

Zip Code

III. PRISONER STATUS

Indicate below whether you are a prisoner or other confined person:

☒ Pretrial detainee☐ Civilly committed detainee

☒ Immigration detainee

☐ Convicted and sentenced prisoner

Other: _____

IV. DEFENDANT INFORMATION

To the best of your ability, provide the following information for each defendant. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are identical to those listed in the caption. Attach additional pages as necessary.

Defendant 1: CALVIN BLACK aka NYPD SGT tax ID# 948676
43 Precinct, Bronx County

Defendant 2: Current Job Title (or other identifying information) Elijah P. Rodrigo d/b/a NYPP Agent

Current Work Address 43 precinct, N.Y.

County, City State Zip Code

Elijah Rodrigo Tax ID # 972213

First Name Last Name ~~Shield #~~

Defendant 3: Current Job Title (or other identifying information) Felix D. Jimenez

Current Work Address 43 precinct Bronx N.Y.

County, City State Zip Code

Felix Jimenez

First Name Last Name Shield #

Defendant 4: Current Job Title (or other identifying information) 6 - John Doe (see Executive law 234)

Current Work Address 43 precinct, Bronx N.Y.

County, City State Zip Code

John Doe x 6

First Name Last Name Shield #

Current Job Title (or other identifying information)

Current Work Address

County, City State Zip Code

v. STATEMENT OF CLAIM

Place(s) of occurrence: North East Corner, Watson Avenue and Morrison Avenue

Date(s) of occurrence: September 12, 2023

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and how each defendant was personally involved in the alleged wrongful actions. Attach additional pages as necessary.

I was traveling in my private auto mobile on Watson Avenue. I stopped at a red light, then I saw a ~~NYPD~~ Vehicle stopped behind me, after the light turned green I proceed to travel on my way. There after without any emergency, I saw said NYPD vehicle turned on flashing lights behind me, telling me to pull over. I pulled over to the right, roll my window half way down. John Doe NYPD agent walked up to my window. I asked him what is the emergency and the reason for the stop? He just said exit the vehicle, I then ask him, "may I talk ~~spea~~ to your captain?" he refuse, then reached for his loaded fire arm. I was in fear of my life because he is using deadly force. Due to the fact seeing POLICE killing innocent people on the News over traffic stop, I continue to travel on my way to save my life and I am aware that the use of the highways for the purpose of ingress, regress, traveling and/or transportation is not a mere privileg, but a common and fundamental right of which the public and Natural Beings cannot be deprived. I was kidnapped taken into the 43 precinct, held for ^{ransom} 3 days without, bath, water to drink, bed to sleep on. I was forced to remain kidnapped without any one of my family and friend knowing where I was. I was beaten up by 4 NYPD agents on the 13th of September, 2023 and

hand cuffed extremely tight with foot shackles, ^{intentionally} ~~extremely~~ tightened and dragged to a parked NYPD unmarked vehicle, then thrown into the back seat. I was in extreme pain to my hands, no blood circulation in both hands and feet due to use of force used. I was asking the 2 John Doe NYPD agent to take me to a hospital. They refused, instead I was brought to Bronx Central Bookings, after 5 to 6 hours sitting in the unmarked NYPD vehicle without medical attention. Upon entering Central Booking I request to ^{a DOC} ~~another~~ agent that I need medical attention. That's when I was taken to Jacobi North Central Bronx Hospital for treatment. I ^{was} ~~had to be~~ taken into the hospital in a wheel chair because I could not walk. There after I was taken back to the precinct for 2 days without seeing a judge.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

The NYPD agents attempted to kill me, by using their vehicle to aggressively rammed my auto mobile off the roadway twice at the back left side, near the tire of my truck, causing me to swerved in and out of other auto mobile on the roadway. I am traumatized for life of their behaviour, after I came to a complete stop, John Doe NYPD, SGT. CALVIN BLACK and ELIJAH RODRIGO used excessive force break out 3 of my windows, Forcefully, pull me out my truck, Face down on the hot tar on the street and hand cuffed me extremely tight behind ~~my~~ ^{my} back. See Attached Paper.

VI. RELIEF State briefly what money damages or other relief you want the court to order.

Please assign meaning access for counsel to assist me pursuant to (28 U.S.C. § 1915(d)). And the total money damages, Seven million

Attached Paper: Injuries

I am also injured by the false statements made by Elijah Rodrigo On September 13, 2023, averred "deponent further states that he observed defendants vehicle collide in a school bus and said school bus was loaded with children." His statement was all made up, to falsified the record to get a conviction with me. See complaint Attached #8.

This unlawful arrest & cause me to remain incarcerated under a false warrant issued by the New York Department of Parole on September 16, 2023, without due process of law, without notice, service or oath or affirmation.

I am deprived of life liberty and Pursuit of happiness by remaining incarceration in a maximum classification cell at OBCC, 5 North 16 Hazen Street, East Elmhurst, NY. I have been in jail since Sep. 16, 2023 until todays date Oct 17, 2023, without conviction of a lawful mandate, under a name WINSTON HALL, which is a Legal fiction, estate, trade marked and copyright and DBA Filed in Wake County in North Carolina and Certificate of Designation Filed with Secretary of New York State and AJO News Paper Legal Notice Pursuant to 12 USC 95 (a)(2), ran for 3-4 weeks on Public Record, since 2014.

I am being forced to be identify by that name, in violation of ~~CFR~~ NY Civil Rights Law, Article 6 § 64, Effect, an order on Public record Since June of 2015. I have filed multiple grievance at DOC, and they where all ignored and/or denied.

for each defendant(s). There is 9 defendants in total include punitive damages. Total amount is \$189,000,000
 I am respectfully requesting, mediation and ~~psy~~ psych evaluation for each defendant and/or relieve of their public duties.

VII. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I understand that if I file three or more cases while I am a prisoner that are dismissed as frivolous, malicious, or for failure to state a claim, I may be denied in forma pauperis status in future cases.

I also understand that prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions, 42 U.S.C. S 1997e(a), and that my case may be dismissed if I have not exhausted administrative remedies as required.

I agree to provide the Clerk's Office with any changes to my address. I understand that my failure to keep a current address on file with the Clerks Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

10-17-2023

Dated

By. Sage

First Name

Middle Initial

Last Name

0 BCC 16 Hazen Street

Prison Address

By. Sage, E1
 Plaintiff's Signature Authorize Representative

East Elmhurst

County, City

New York

State

[11370]

Zip Code

Date on which I am delivering this complaint to prison
authorities for mailing:

Oct 17th, 2023

Telephone Number

917-426-2103

Date

UNITED STATES DISTRICT COURTS
SOUTHERN/EASTERN DISTRICTS OF NEW YORK

E-mail Address (if
available),

Winstonghallet@gmail.com
Signature

Sage El dba Hall, Winston

(In the space above enter the name(s) of the petitioner(s).

Civ. () ()

- against -

CALVIN S. BLACK, DBA NYPD SGT Tax ID#
948676, et al

ALL IN THEIR PERSONAL AND OFFICIAL

CAPACITY

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

Pursuant to Fed. R. Civ. P. 26(e), 33, 34 and 45, and Local Civil Rule 33.2, the defendants shall answer, under oath, the following interrogatories, and produce copies of the following documents, within 120 days of the service of the complaint on any named defendant, at the plaintiffs current address, ¹ as indicated below.

These requests apply in Use of Force Cases, Inmate Against Inmate Assault Cases and Disciplinary Due Process Cases, as defined below, in which the events alleged in the complaint occurred while the plaintiff was in the custody of the Department of Correction of the City of New York, the New York State Department of Corrections & Community Supervision, or any other jail, prison or correctional facility operated by or for a city, county, municipal or other local governmental entity (collectively, the "Department").

PLAINTIFF'S LOCAL CIVIL
RULE 33.2 INTERROGATORIES
AND REQUEST FOR
PRODUCTION OF DOCUMENTS

DEFINITIONS

1. "Department" refers to the Department of Correction of the City of New York, New York State Department of Corrections & Community Supervision, and/or any other city, county, municipal or other local governmental entity that operates a jail, prison or correctional facility.
2. "Facility" refers to the correctional facility where the Incident is alleged to have occurred.
3. "Use of Force Case" refers to an action in which the complaint alleges that an employee of the Department, or Facility used physical force against the plaintiff in violation of the plaintiff's rights.

Unless otherwise ordered by the Court, if within the 120-day period the defendant(s) moves for dismissal under Fed. R. Civ. P. 12(b) or 12(c), or moves for summary judgment on grounds which would be dispositive of the action in toto, defendants shall respond 30 days from denial of such motion in whole or in part.

4. "Inmate against Inmate Assault Case" refers to an action in which the complaint alleges that an employee of the Department or Facility was responsible for plaintiff's injury resulting from physical contact with another inmate.
5. "Disciplinary Due Process Case" refers to an action in which (i) the complaint alleges that an employee of the Department or Facility violated or permitted the violation of a constitutional right(s) in a disciplinary proceeding against plaintiff, and (ii) the punishment imposed upon plaintiff as a result of that proceeding was placement in a special housing unit for more than 30 days.
6. "Incident" refers to the event or events described in the complaint. If the complaint alleges a due process violation in the course of prison disciplinary proceedings, "Incident" also refers to the event or events that gave rise to the disciplinary proceedings.
7. "Identify," when applied to persons, shall mean:
(i) full name and current or last known address for service; and (ii) for Department or Facility employees, badge number or numbers, if any; (iii) for former or present inmates, any and all inmate identification numbers, including "book and case," "DN" and "NYSID" numbers.
8. "Identify," when used in connection with a civil or criminal proceeding shall mean: the case name, court, docket number and date of commencement.

INSTRUCTIONS

1. All defendants represented by the Office of the Corporation Counsel of the City of New York, the Office of the Attorney General or counsel for or appointed by the Department

responsible for the Facility, are instructed to produce documents (or copies thereof) and provide information in the defendants' custody, possession or control and documents and information in the custody, possession or control of the Department or Facility. If the Department or Facility is not a party, documents and information shall be produced as if a Rule 45 subpoena had been served on the Department or Facility. All responses are subject to the requirements of Fed. R. Civ. P. 26(e). Documents so produced shall be Bates-stamped or otherwise numbered sequentially.

2. Whenever defendants or the non-party Department or Facility withhold any document or portion thereof that is responsive to any of the document requests for reasons of privilege or institutional security, counsel for defendants shall (i) obtain a copy of the document (including audio tape, videotape, electronic recording or photograph) from the appropriate agency or defendant and retain such document in defense counsel's office until the conclusion of the litigation; (ii) serve and file a (privilege) log in conformity with Fed. R. Civ. P. 26(b)(5) or Local Civil Rule 26.2, setting forth the reason for withholding the document; and (iii) make the withheld document available upon request to the Court. If the document is withheld for reasons of institutional discipline or security, rather than privilege, the document

shall also be made available to pro bono counsel, or to an interested attorney considering the Court's request for pro bono counsel, who shall maintain it in strict confidence. If security interests can be addressed by redacting a portion of the document, the redacted document shall be produced to plaintiff. Counsel for defendants may also take appropriate measures to ensure that Department letterhead, forms and stationery are not misused by plaintiff.

3. If any document responsive to this request exists in the form of a tape recording, video recording or other electronic recording it shall be preserved until the conclusion of the litigation. If a tape recording has not been transcribed, a copy of such tape or electronic recording shall be produced, subject to any state law or regulation barring access on grounds of security. If the tape, video or electronic recording is not produced to plaintiff, defense counsel shall retain the tape and make it available upon request to the Court, pro bono counsel or any pro bono attorney considering acceptance of the case. Any transcript shall be treated as any other responsive document.
4. The documents responsive to requests 8 through 11 shall be provided for a period of ten years prior to the filing of the complaint, shall be provided by the Department or Facility to defense counsel within the 120-day responsive period and shall be maintained in defense counsel's office until the conclusion of the litigation. Such documents shall be produced to the Court upon request or to pro bono counsel as provided in Instruction 2. If the case proceeds to trial and plaintiff is not represented, the Court shall address prior to trial the disclosure of such documents to plaintiff for use at trial. If the response to any of requests 8 through 11 is "None," that response shall be provided to plaintiff at the time these requests are responded to.

INTERROGATORIES AND DOCUMENT REQUESTS

1. With respect to any disciplinary proceeding in which plaintiff alleges the denial of a constitutional right, produce all documents concerning the proceeding, including: reports of infraction; notices of infraction; misbehavior reports; any records reflecting informal interviews with the plaintiff or opportunities for the plaintiff to object to the discipline or housing status related to the discipline; disciplinary hearing records; hearing transcripts;¹ infraction and/or hearing disposition sheets; notices of administrative appeal and any accompanying documents; and any decisions on administrative appeal.
2. Identify all Department and Facility employees who were present at, witnessed or investigated the Incident or who at or about the time of the Incident were assigned to work in the area where the Incident occurred (if such area is identifiable and discrete).
3. Identify all persons (including prisoners) other than Department and Facility employees who were present at the Incident.
4. Produce any and all of the following documents in the custody, possession or control of the Department or Facility prepared by or at the direction of any employee of the City of New York, the State of New York or any other governmental entity in connection with the Incident: incident reports, intradepartmental memoranda (including memoranda sometimes referred to as "to/from"s"), use of force reports, unusual incident reports, witness statements, injury to inmate reports, video or audio tapes, photographs, reports of infraction, notices of infraction, dispositions of any infraction, misbehavior reports including documents in the file of any inmate disciplined in connection with the incident.
5. Produce all files, including each closing memorandum and summary, made in the course of any completed investigation by the Department of Investigations, Inspector General or Internal Affairs Division (or similar groups) into the Incident. If the Incident or the conduct of defendants involved in the Incident is the subject of an ongoing investigation or a disciplinary proceeding, criminal investigation or outstanding indictment or information, discovery under this request shall be suspended until the termination thereof (whether by completion of the investigation without charges being brought or by disposition of such charges). A response shall be due thirty (30) days after such termination.
6. If Plaintiff alleges physical injury and has authorized release, produce records of all medical treatment provided to the plaintiff in connection with such injury or claim. If defendants seek to rely on plaintiff's pre-existing medical condition as a complete or partial defense to any claim raised in the complaint, produce all records relating to such pre-existing medical condition generated during plaintiff's present and any prior term of incarceration. (If plaintiff fails to provide a release authorizing disclosure of medical records, defendants may move to compel such release or to dismiss some or all of plaintiff's claims). If production is made hereunder, identify all medical care providers assigned to work in the Facility clinic on the date of the Incident and identify the signature or initials

¹ An untranscribed tape shall be treated as provided for in Instruction 3.

of each individual who has made an entry on reports or other writings prepared by the medical care provider regarding the Incident or regarding plaintiff's treatment.

7. If any defendant claims to have been physically injured in the Incident and is relying on the injury as a defense to the action, produce all records and claims of injury and all records of medical treatment provided to that defendant in connection with such injury. If defendant refuses to give consent to the release of medical records, defendant shall state whether defendant was treated at a prison facility, a clinic or by a private doctor and the date and place of each such treatment. If production is made hereunder, identify the signature or initials of each individual who has made an entry on reports or other writings prepared by the medical care provider regarding the Incident or regarding defendant's treatment.
8. For any defendant, other than for the Commissioner, any Deputy Commissioner or Assistant Commissioner, Warden and ranks above (and any similar positions for other Departments and Facilities), identify and produce all documents concerning any employment-related proceeding, whether administrative, civil or criminal, in which the defendant was formally counseled, disciplined, punished, or criminally prosecuted or otherwise made the subject of remedial action in connection with having failed to make a report or having made a false statement of any kind.
9. In a Use of Force Case, identify and produce all documents concerning any employment-related proceeding, whether administrative, civil or criminal, in which any defendant was formally counseled, disciplined, punished, criminally prosecuted or otherwise made the subject of remedial action in connection with having used force on an inmate.
10. In an Inmate against Inmate Assault Case, identify and produce all documents concerning any employment-related proceeding, whether administrative, civil or criminal, in which any defendant was formally counseled, disciplined, punished or criminally prosecuted or otherwise made the subject of remedial action in connection with having failed to supervise inmates property or failed to fulfill any or his or her responsibilities involving inmate safety.
11. In a Disciplinary Due Process Case, identify and produce all documents concerning any employment-related proceeding, whether administrative, civil or criminal, in which any defendant was formally counseled, disciplined, punished, prosecuted or otherwise made the subject of remedial action in connection with that defendant's participation in or conduct of a disciplinary proceeding where it was alleged that the defendant violated a Department regulation or a constitutional right of an inmate.
12. Produce from the plaintiff's inmate file for the period of incarceration during which the Incident arose (and any other Facility file for plaintiff if any defendant intends to rely on any of its contents) all documents concerning any occasion that plaintiff was subject to discipline. If

the disciplinary record is lengthy, the defendant may, in the first instance, produce a computer printout of plaintiff's inmate's disciplinary history.

CRIMINAL COURT OF THE CITY OF NEW YORK
BRONX COUNTY

CR-020258-23BX



THE PEOPLE OF THE STATE OF NEW YORK

v.

STATE OF NEW YORK

COUNTY OF THE BRONX

1. WINSTON HALL M/42
Arrest# B23639003

Defendant

PO ELIJAH RODRIGO of 43 PCT, Shield# 11451, states that on or about September 12, 2023 at approximately 1:15 PM at Northeast corner of Watson Avenue and Morrison Avenue, County of the Bronx, State of New York,

THE DEFENDANT COMMITTED THE OFFENSES OF:

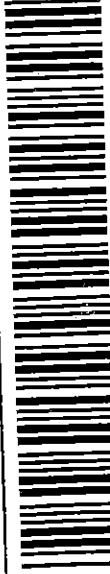
- 1 (F) P.L. 120.25 Reckless Endangerment 1^ DQO
- 2 (M) P.L. 270.25 UNLAWFUL FLEEING A POLICE OFFICER IN A MOTOR VEHICLE THIRD DEGREE DQO
- 3 (M) P.L. 120.20 Reckless Endangerment 2^ DQO
- 4 (M) V.T.L. 1212 Reckless Driving

IN THAT THE DEFENDANT DID: recklessly engage in conduct which created a risk of death to another person, under circumstances evincing a depraved indifference to human life; knowing that he or she has been directed to his or her motor vehicle by a uniformed police officer or a marked police vehicle by the activation of either the lights or the lights and siren of the vehicle, he or she thereafter attempts to flee such officer or such vehicle, driving at speeds which equal or exceed twenty-five miles per hour and speed limit or engaging in reckless driving as defined by section twelve hundred twelve of the vehicle and traffic law; recklessly engage in conduct which created substantial risk of serious physical injury to another person drive or use a vehicle propelled by a power other than muscular power in a manner which unreasonably interfered with the free and proper use of the highway, or unreasonably endangered users of the public highway.

THE GROUNDS FOR THE DEPONENT'S BELIEF ARE AS FOLLOWS:

Deponent states that, at the above time and place, he observed the defendant to be operating a silver 2018 Range Rover, (VIN #SALYM2Rx9JA721497) which was seated behind the steering wheel, keys in the ignition, engine running and moving along a public roadway. Deponent further states that said vehicle was not registered to said Range Rover.

Deponent further states that when he activated the lights of his marked patrol vehicle, defendant pulled over. Deponent further states that upon deponent exiting his marked vehicle to approach defendant, defendant stopped after asking the defendant to exit said vehicle defendant got out of the vehicle and off on to a public roadway.



Deponent further states that, while operating his marked police vehicle dressed in his official New York City Police Department uniform, after activating the lights and sirens of his marked patrol vehicle, directing to stop, defendant did not stop operating his motor vehicle and had drove at a high rate of speed along public roads. Deponent further states that he observed defendant to be operating the aforementioned vehicle in excess of fifty miles per hour in a twenty-five mile per hour zone.

Deponent further states that he observed defendant to drive through red lights and to be swerving in and out of other vehicles on the way, causing the other vehicles to either apply their brakes or swerve to avoid colliding with defendant and several people jump out of the way to avoid being hit by defendant's vehicle. Deponent further states that deponent observed defendant's vehicle collide with deponent's marked vehicle, in which defendant was the driver of, striking it on the right bumper on the road, and the defendant continued to drive off, without stopping.

Deponent further states that he observed the defendant's vehicle collide with a school bus and said school bus was loaded with children.

FALSE STATEMENTS MADE HEREIN ARE PUNISHABLE
AS A CLASS A MISDEMEANOR PURSUANT TO P.L. 210.45

9/13/23 11:59

DATE and TIME

SIGNATURE



002840987

CR-020258-23BX

CR-020258-23BX

CRIMINAL COURT OF THE CITY OF NEW YORK
BRONX COUNTY

OF THE STATE OF NEW YORK

STATE OF NEW YORK

V.

COUNTY OF THE BRONX

TON HALL M/42
SC# B23639003

Defendant

ERIKAH RODRIGO of 43 PCT, Shield# 11451, states that on or about 11:12, 2023 at approximately 1:15 PM at Northeast corner of Watson and Morrison Avenue, County of the Bronx, State of New York,

DEFENDANT COMMITTED THE OFFENSES OF:

Reckless Endangerment 1st DQO
UNLAWFUL FLEEING A POLICE OFFICER IN A
MOTOR VEHICLE THIRD DEGREE DQO
Reckless Endangerment 2nd DQO
Reckless Driving

120.20
121.1 1212

THE DEFENDANT DID: recklessly engage in conduct which created a grave threat to another person, under circumstances evincing a depraved indifference to human life; knowing that he or she has been directed to stop her motor vehicle by a uniformed police officer or a marked police officer, the activation of either the lights or the lights and siren by her or she thereafter attempts to flee such officer or such vehicle by driving at speeds which equal or exceed twenty-five miles per hour above the limit or engaging in reckless driving as defined by section twelve of the vehicle and traffic law; recklessly engage in conduct which creates a substantial risk of serious physical injury to another person and use a vehicle propelled by a power other than muscular power in a manner which unreasonably interfered with the free and proper use of the public highway.

THE FOLLOWING UNREASONABLY ENDANGERED USERS OF THE PUBLIC HIGHWAY:

IT IS FOUNDS FOR THE DEPONENT'S BELIEF ARE AS FOLLOWS:
The deponent states that, at the above time and place, he observed defendant operating a silver 2018 Range Rover, (VIN #SALYM2RX9JA720467), in that he was driving behind the steering wheel, keys in the ignition, engine running, and parked along a public roadway. Deponent further states that said VIN number is registered to said Range Rover.

The deponent further states that when he activated the lights and sirens on the marked patrol vehicle, defendant pulled over. Deponent further states that defendant exiting his marked vehicle to approach defendant's vehicle and asking the defendant to exit said vehicle defendant proceeded to drive away on a public roadway.



002840987

Deponent further states that, while operating his marked police vehicle dressed in his official New York City Police Department uniform, after activating the lights and sirens of his marked patrol vehicle, directing the vehicle to stop, defendant did not stop operating his motor vehicle and drove at a high rate of speed along public roads. Deponent further states that he observed defendant to be operating the aforementioned vehicle in excess of fifty miles per hour in a twenty-five mile per hour zone.

Deponent further states that he observed defendant to drive through red lights and to be swerving in and out of other vehicles on the way, causing the other vehicles to either apply their brakes or swerve to avoid colliding with defendant and several people jump out of the way to avoid being hit by defendant's vehicle. Deponent further states that deponent observed defendant's vehicle collide with deponent's marked vehicle, in which defendant was the driver of, striking it on the right bumper on the road, and the defendant continued to drive off, without stopping.

Deponent further states that he observed the defendant's vehicle collide with a school bus and said school bus was loaded with children.

FALSE STATEMENTS MADE HEREIN ARE PUNISHABLE
AS A CLASS A MISDEMEANOR PURSUANT TO P.L. 210.45

9/13/23 11:59

DATE and TIME

SIGNATURE



002840987

PRESS FIRMLY TO SEAL



PRESS FLI



PME 1-Day
NEW YORK, NY 10025
NOV 20, 2023



\$28.75

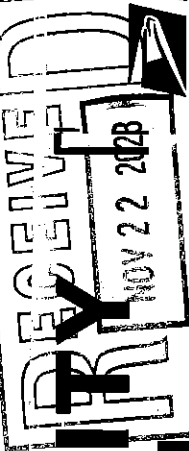
10007

RDC 07

R2305P150825-77

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PRESS FIRMLY TO SEAL



UNITED STATES
POSTAL SERVICE®

PRIORITY
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EXPRESS®



TO: (PLEASE PRINT)
FROM: (PLEASE PRINT)

410 Sage El dba Hall Winston
410: 388 E 79 Street
Brooklyn, New York republic
[110037]

PHONE ()

AT RATE
ENVELOPE
RATE ■ ANY
SECURITY

schedule free Package Pickup,
scan the QR code



USPS.COM/PICKUP



PS10001000006

EP13F May 2020
OD: 12 1/2 x 9 1/2



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USPS Corporate Acct. No.

Federal Agency Use (Use for Postal Service Acct. No.)

ORIGIN (POSTAL SERVICE USE ONLY)

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10025

Date Accepted (MM/DD/YY)

11-20-23

Time Accepted

4:21 PM

Special Handling/Fragile

\$

Weight

0 5:20 lbs.

Acceptance Employee Initials

KA

Scheduled Delivery Time (MM/DD/YY)

11-21-23

Postage

\$ 28.75

Insurance Fee

\$

Return Receipt Fee

\$

Live Animal Transportation Fee

\$

COD Fee

\$

Total Postage & Fees

\$ 28.75

Employee Signature

Employee Signature

PSN 7890-02-000-6898

LABEL 11-B, MAY 2021